

EXHIBIT B

Moon Wright & Houston, PLLC
212 N. McDowell Street, Suite 200
Charlotte, NC 28204

CHARLOTTE NC 280

28 MAY 2024 PM 6:41

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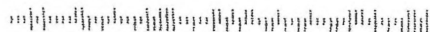
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MAY 30 2024

B. Chad Ewing
Russ Ferguson
Womble Bond Dickinson (US) LLP
301 South College Street, Suite 3500
Charlotte, NC 28202-6037

28202-605075



COPY

STATE OF NORTH CAROLINA FILED IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
COUNTY OF UNION 2024 MAY 28 AM 10:34 24-CVS-1379

HAYWARD INDUSTRIES, INC., C.B.C.

Plaintiff, SY

vs.

BLUEWORKS CORPORATION and
ZHOUJING "GINA" LU,

Defendants.

MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT

Defendant Zhoujing "Gina" Lu (the "Defendant") by and through undersigned counsel, moves the Court pursuant to North Carolina Rule of Civil Procedure 6 for an extension of time to answer or otherwise respond to the Complaint filed by Plaintiff Hayward Industries, Inc., on the grounds that she requires additional time to investigate the allegations against her and to prepare an appropriate response. The Defendant was served with the Complaint and Summons on April 29, 2024; accordingly, her time to respond to the Complaint has not expired as of the date of this motion. The Defendant makes this motion in good faith and not for the purpose of unnecessary delay.

WHEREFORE, the Defendant requests that the Court enter an order extending the time for her to answer or otherwise plead in response to the Complaint for a period of thirty (30) days, through and including June 28, 2024.

[Remainder of Page Intentionally Left Blank]

This 28th day of May, 2024

MOON WRIGHT & HOUSTON, PLLC



Richard S. Wright (NC Bar No. 24622)

212 N. McDowell Street, Suite 200

Charlotte, NC 28204

Telephone: (704) 944-6560

Facsimile: (704) 944-380

Attorneys for Zhoujing Lu

CERTIFICATE OF SERVICE

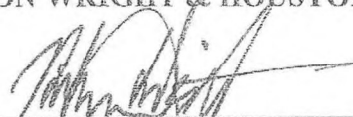
I hereby certify that a copy of the foregoing Motion for Extension of Time to Respond to Complaint was served this date upon the persons named below via United States mail, sufficient postage prepaid, addressed as follows:

B. Chad Ewing
Russ Ferguson
Womble Bond Dickinson (US) LLP
301 South College Street, Suite 3500
Charlotte, NC 28202-6037

Blueworks Corporation
Haoqi Sun, Registered Agent
8408 Channel Way
Waxhaw, NC 28173-7070

This 28th day of May, 2024

MOON WRIGHT & HOUSTON, PLLC



Richard S. Wright (NC Bar No. 24622)
212 N. McDowell Steet, Suite 200
Charlotte, NC 28204
Telephone: (704) 944-6560
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Attorneys for Zhoujing Lu

COPY

FILED

STATE OF NORTH CAROLINA

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION

COUNTY OF UNION

2024 MAY 28 AM 10:40

24-CVS-1379

HAYWARD INDUSTRIES, INC. UNION CO. C.S.C.

Plaintiff,

vs.

BLUEWORKS CORPORATION and
ZHOUJING "GINA" LU,

Defendants.

**ORDER GRANTING EXTENSION OF TIME FOR ZHOIJING "GINA" LU TO
RESPOND TO COMPLAINT**

FOR GOOD CAUSE SHOWN, the time for Defendant Zhoujing "Gina" Lu to answer or otherwise respond to the Complaint of Hayward Industries, Inc. is hereby extended through and including June 28, 2024.

This 28th day of May, 2024


Clerk of Superior Court

COPY

STATE OF NORTH CAROLINA **FILED** IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION

COUNTY OF UNION 2024 MAY 28 AM 10:40 24-CVS-1379

HAYWARD INDUSTRIES, INC. UNION CO. C.S.C.

Plaintiff,

vs.

BLUEWORKS CORPORATION and
ZHOUJING "GINA" LU,

Defendants.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the Order Granting Extension of Time for Zhoujing "Gina" Lu to Respond to Complaint and a copy of this Certificate of Service were served this date upon the persons named below via United States mail, sufficient postage prepaid, addressed as follows:

B. Chad Ewing
Russ Ferguson
Womble Bond Dickinson (US) LLP
301 South College Street, Suite 3500
Charlotte, NC 28202-6037

Blueworks Corporation
Haoqi Sun, Registered Agent
8408 Channel Way
Waxhaw, NC 28173-7070

This 28th day of May, 2024

MOON WRIGHT & HOUSTON, PLLC



Richard S. Wright (NC Bar No. 24622)
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Attorneys for Zhoujing Lu

R|C|D

RAYBURN COOPER
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227 WEST TRADE STREET
SUITE 1200
CHARLOTTE, NC 28202-1672

CHARLOTTE NC 280

30 MAY 2024 PM 6 L

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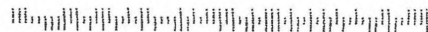
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B. Chad Ewing
Womble Bond Dickinson (US), LLP
301 South College Street, Suite 3500
Charlotte, NC 28202

28202-505075



STATE OF NORTH CAROLINA
COUNTY OF UNION

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
24-CVS-1379

FILED

HAYWARD INDUSTRIES, INC.

2024 MAY 29 A 10:26

Plaintiff,

UNION CO., CASE

v.

BY

PSM

**DEFENDANT BLUEWORKS
CORPORATION'S MOTION FOR
EXTENSION OF TIME TO ANSWER**

BLUEWORKS CORPORATION and
ZHOUJING "GINA" LU,

Defendants.

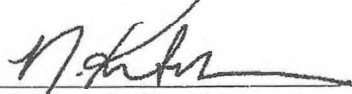
Pursuant to Rule 6(b) of the North Carolina Rules of Civil Procedure, Blueworks Corporation ("Blueworks") through counsel, hereby respectfully moves this Court for a thirty-day extension through and including Friday, June 28, 2024, of the time in which Blueworks must answer the Complaint or otherwise serve its responsive pleading in this action. In support of this motion, Blueworks shows the Court that:

1. The complaint was filed in this Court on April 26, 2024.
2. Blueworks received service of the Complaint and Summons on April 29, 2024.
5. Pursuant to Rule 12(a), Blueworks believes the current deadline to answer the Complaint is Wednesday, May 29, 2024 which is thirty (30) days following service of the summons and Complaint. Blueworks seeks a thirty-day enlargement of time through and including Friday, June 28, 2024, in order to properly evaluate the allegations of the complaint and to prepare an appropriate response.
6. The extension is sought in good faith and not merely for the sake of delay. No previous extensions have been sought.

WHEREFORE, Defendant Blueworks Corporation prays that this Court extend the period within which Defendant Blueworks Corporation must answer or otherwise serve a responsive pleading to the complaint through and including Friday, June 28, 2024.

This the 29th day of May, 2024.

RAYBURN COOPER & DURHAM, P.A.

By: 

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*Attorneys for Defendant Blueworks
Corporation*

STATE OF NORTH CAROLINA

IN THE GENERAL COURT OF JUSTICE

COUNTY OF UNION

FILED

SUPERIOR COURT DIVISION

24-CVS-1379

HAYWARD INDUSTRIES, INC.

2024 MAY 29 A 10:31

Plaintiff,

UNION CO., C.S.C.

v.

BY *Sp*

ORDER

BLUEWORKS CORPORATION and
ZHOUJING "GINA" LU,

Defendants.

Upon the motion of Defendant Blueworks Corporation, and for good cause shown IT IS
HEREBY ORDERED that Defendant Blueworks Corporation is hereby granted a thirty (30) day
extension of time in which to answer or otherwise respond to the complaint in this action, through
and including Friday, June 28, 2024.

This the 29th day of May, 2024.

Angela Parker
Assistant Clerk of Superior Court

{00389471 v 2 } 3

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing MOTION FOR EXTENSION OF TIME and proposed ORDER was served on this date upon the parties in this action by first-class United States mail, postage prepaid, addressed as follows:

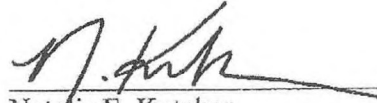
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rwright@mwhattorneys.com

Attorney for Zhoujing Lu

This the 29th day of May, 2024



Natalie E. Kutcher